

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

AMAZON.COM, INC.; AMAZON.COM
SERVICES LLC; AND AMAZON WEB
SERVICES, INC.,

Defendants.

Case No. 7:24-CV-00030-DC-DTG

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff VitraMove Corp. (“Plaintiff”) and Defendants Amazon.com, Inc., Amazon.com Services, LLC and Amazon Web Services, Inc. (“Defendants”) hereby jointly move for a two-week extension of time for Plaintiff to file their response to Defendants’ Motion to Dismiss (Dkt. 16), and an additional week for Defendants to file their reply in support of the Motion.

Plaintiff’s deadline to respond to the Motion is currently April 19, 2024 and, with this two-week extension, the deadline would be May 3, 2024. Defendants’ deadline to reply in support of the Motion is currently due on April 26, 2024 and, with an additional week to respond, the deadline would be May 17, 2024. These extensions are not being sought for purposes of delay, but rather to ensure the parties and their counsel have adequate time to address the numerous issues raised in Defendants’ Motion.

Counsel for the parties have conferred and all parties stipulate to this extension. Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

April 12, 2024

Respectfully submitted,

By: /s/ Reza Mirzaie

Reza Mirzaie (CA SBN 246953)
rmirzaie@raklaw.com
Marc A. Fenster (CA SBN 181067)
mfenster@raklaw.com
Neil A. Rubin (CA SBN 250761)
nrubin@raklaw.com
Amy E. Hayden (CA SBN 287026)
ahayden@raklaw.com
Christian W. Conkle (CA SBN 306374)
cconkle@raklaw.com
Jonathan Ma (CA SBN 312773)
jma@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
Telephone: (310) 826-7474

Attorneys for Plaintiff VirtaMove, Corp.

By: /s/ Andrew Harper Estes
Andrew Harper Estes
Lynch, Chappell & Alsup, PC
300 N. Marienfeld, #700
Midland, TX 79701
Telephone: (432) 683-3351
Email: hestes@lcalawfirm.com

Attorney for Defendants Amazon.com, Inc., Amazon.com Services, LLC and Amazon Web Services, Inc.

CERTIFICATE OF SERVICE

I certify that on April 12, 2024, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Reza Mirzaie _____

Reza Mirzaie